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7

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 GATEWAY INSURANCE COMPANY, a
11 Missouri corporation,

12 Plaintiff,

13 vs.

14 ALEXANDER FERNANDEZ-LEON, an
individual; YENDRY HERNANDEZ-
15 ECHEVARRIA, an individual; GRETSIN
CONSUEGRA SORIANO, an individual;
16 JUAN SCHUEG-CASTRO, an individual;
JOSE PRIETO-HERNANDEZ, an individual;
17 NELLIS CAB LLC, OPERATION SERIES
NELLIS CAB LLC, VEH. SERIES 102, a
18 Nevada series limited liability company,

19 Defendants.

Case No.: 2:19-cv-00771-APG-BNW

**STIPULATION AND ORDER TO
EXTEND DEADLINES FOR REPLY
IN SUPPORT OF MOTION FOR
STAY AND FOR OPPOSITION TO
MOTION TO DISMISS**

(First Request)

20 Plaintiff Gateway Insurance Company ("Plaintiff") by and through its counsel of record,
21 Scott A. Flinders and Todd W. Prall of the law firm Hutchison & Steffen, PLLC, and
22 Defendants Yendry Hernandez-Echevarria, Gretsin Consuegra Soriano, Juan Schueg-Castro,
23 and Jose Prieto-Hernandez ("Defendants"), by and through their counsel, Joseph A. Gutierrez
24 and Stephen G. Clough of Maier Gutierrez and Associates, and hereby stipulate and agree to
25 extend the time to file a reply in support of Plaintiff Gateway Insurance Company's Notice
26 and/or Motion for Stay Due to Gateway Insurance Company's Liquidation ("Motion for Stay")
27 (Doc. #56), which Defendants opposed (Doc. #57), and an opposition to Defendants'
28 Countermotion to Dismiss for Want of Prosecution ("Countermotion") (Doc. #58) to August

1 13, 2020. Plaintiff requested this extension because it has not yet obtained necessary direction
2 concerning how to manage this lawsuit from the receiver, and Plaintiff needs additional time to
3 ensure that the receiver for Plaintiff can provide counsel with direction on how to proceed with
4 the lawsuit.

5 Pursuant to Local Rule 6-1(B), the parties hereby aver that this is the first such
6 discovery extension requested in this matter and is not sought for the purposes of delay.

7 Plaintiff and Defendants, therefore stipulate as follows:

8 1. That Plaintiff shall have until August 13, 2020 to file a reply in support of the its
9 Motion for Stay (Doc. #56).

10 2. That Plaintiff shall have until August 13, 2020 to file an opposition to the
11 Countermotion (Doc. #58).

12 DATED this 30th day of July, 2020.

DATED this 30th day of July, 2020.

13 HUTCHISON & STEFFEN, PLLC

MAIER GUTIERREZ & ASSOCIATES

14
15 /s/ Todd W. Prall
16 Scott A. Flinders (6975)
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/s/ Stephen G. Clough
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*Attorneys for Defendants Yendry
Hernandez-Echeverria, Gretsin
Consuegra Soriano, Juan Schueg-Castro,
and Jose Preito-Hernandez*

20
21 IT IS SO ORDERED

22
23 
24 United States District Judge

25 Dated: 7/30/2020
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